

MEMO ENDORSED

PROSKAUER ROSE LLP

1585 Broadway
New York, NY 10036-8299
Telephone 212.969.3000
Fax 212.969.2900

LOS ANGELES
WASHINGTON
BOSTON
BOCA RATON
NEWARK
NEW ORLEANS
PARIS

Kathleen M. McKenna
Member of the Firm

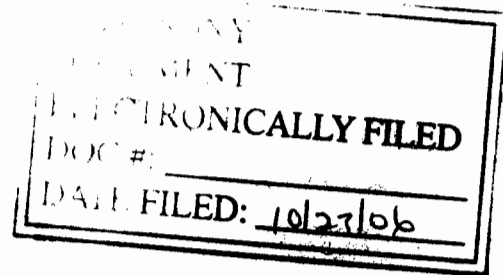
Direct Dial: 212.969.3130
kmckenna@proskauer.com

October 20, 2006

BY FACSIMILE

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
500 Pearl Street, Room 920
New York, NY 10007

Re: Ello v. Singh, et al., Case No. 05 CV 9625



Dear Judge Karas:

We represent Defendants Ishry Singh, Laborers-Employers Cooperation and Education Trust Fund, Mason Tenders' District Council Trust Funds, Raymond Pocino, as a Trustee of the MTDC Funds, and John Virga, MTDC Funds' Director (collectively, the "Fund Defendants") in the above-referenced matter.

The Fund Defendants will be serving their opposition to Plaintiff's motion for leave to amend on Monday, October 23, 2006. In that regard, we respectfully request the Court's permission to exceed by five (5) pages the page limit established by Your Honor's Individual Practices for such submissions. The Fund Defendants require this additional space both to respond to the numerous additional claims Plaintiff purports to add to his existing complaint, and for their request for a sealing order, which has been included in this submission per the Court's instructions at the September 12 conference.

We thank the Court for its consideration in this matter.

Respectfully submitted,

Kathleen M. McKenna

*All parties can have no more than
five pages on the briefs that are yet to be filed.*

SO ORDERED

KENNETH M. KARAS U.S.D.J.
10/21/06